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Daroya Isaiah

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DAROYA ISIAHAH, individually an on
behalf of all others similarly situated,

Plaintiff,

vs.

LOANDEPOT, INC,

Defendant.

Case No.: 8:24-cv-00136-DOC-JDEx

CLASS ACTION

**NOTICE OF RELATED CASES
PURSUANT TO LR. 83-1.3**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Pursuant to Local Rule 83-1.3, Plaintiff Daroya Isaiah (“Plaintiff”), by and through their undersigned counsel, hereby provides the following additional Notice of Related Cases which are also currently pending in the Central District of California (collectively, the “Related Cases”):

1. *Jonathan Rosas v. loanDepot, Inc.*, No. 8:24-cv-00167 (the “*Rosas Case*”)
2. *Joel Eggleton v. loanDepot, Inc.*, No. 8:24-cv-00170 (the “*Eggleton Case*”)
3. *Amy Penird v. loanDepot, Inc.*, No. 8:24-cv-00180 (the “*Penird Case*”)
4. *Brian Webbe v. LoanDepot, Inc.*, No. 8:24-cv-00190 (the “*Webbe Case*”)
5. *Maria Sullivan v. loanDepot, Inc.*, No. 8:24-cv-00194 (the “*Sullivan Case*”).
6. *Terry Rogers v. loanDepot, Inc.*, No. 2:24-cv-00766 (the “*Rogers Case*”)
7. *Jesse Schmidt v. LoanDepot, Inc.*, No. 8:24-cv-00200 (the “*Schmidt Case*”)
8. *Debra Coe v. loanDepot, Inc.*, No. 8:24-cv-00211 (the “*Coe Case*”)
9. *Hunter Six v. loanDepot, Inc.*, No. 8:24-cv-00213 (the “*Six Case*”)
10. *Eljon Lako v. loanDepot, Inc.*, No. 8:24-cv-00216 (the “*Lako Case*”)
11. *Alwin Joy v. loanDepot, Inc.*, No. 8:24-cv-00239 (the “*Joy Case*”)
12. *Amanda Costello v. loanDepot, Inc.*, No. 8:24-cv-00242 (the “*Costello Case*”)

The above-listed Related Cases are related to this action (the “*Isaiah Case*”) because they “arise from the same or a closely related transaction, happening, or event” and “call for determination of the same or substantially related or similar questions of law and fact.” *See* L.R. 83-1.3.2.

Like the *Isaiah Case*, the Related Cases arise from the same, common factual allegations and legal theories, and like the case presently before this Court, the Related Cases include multiple causes of action in common against a common Defendant, loanDepot, Inc. (“Defendant”), relating to the same factual underpinnings of the same data breach underlying this litigation and seek similar relief in response to the same event. Furthermore, the *Isaiah Case* and the Related Cases are brought as class actions and similarly seek certification of overlapping nationwide and/or California class definitions and allege that plaintiffs in the Related Cases as well as the putative class members described therein suffered harm as a result of Defendant’s failure to implement and maintain reasonable and adequate security procedures and practices to safeguard the personally identifiable information (“PII”) of plaintiff and the classes they seek to represent.

1 The present case before this Court as well as the Related cases call for
2 determination of the same or substantially related or similar questions of law and fact,
3 and would entail substantial duplication of labor if heard by different judges. The
4 *Isaiah* Case and the Related Cases commonly allege violations of common law
5 including negligence, negligence per se, breach of contract and/or breach of implied
6 contract, and unjust enrichment.

7 Based on the foregoing, Plaintiff respectfully submits that the above-listed
8 Related Cases, namely: the *Rosas* Case, the *Eggleton* Case, the *Penird* Case, the
9 *Webbe* Case, the *Sullivan* Case, the *Rogers* Case, the *Schmidt* Case, the *Coe* Case, the
10 *Six* Case, the *Lako* Case, the *Joy* Case, and the *Costello* Case, are related to the *Isaiah*
11 Case. Designation of the Related Cases as related to the *Isaiah* case will serve the
12 purposes of the applicable local rule because assignment of these actions to a single
13 judge will conserve judicial resources, avoid the potential for inconsistent rulings,
14 and result in other economies given the overlapping defendants and similar
15 allegations of their behavior, such that both cases are likely to rely on the same
16 evidence. If the actions were to proceed before different judges a substantial and
17 unnecessary duplication of judicial effort, among other inefficiencies, likely would
18 result.

19 Respectfully submitted,

20 Dated: February 6, 2024

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CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Kazerouni Law Group, APC, 245 Fischer Avenue, Unit D1, Costa Mesa, CA 92626. On February 6, 2024, I served the within document(s):

• **NOTICE OF RELATED CASES PURSUANT TO L.R. 83-1.3**

- ☒ CM/ECF - by transmitting electronically the document(s) listed above to the electronic case filing system on this date before 11:59 p.m. The Court's CM/ECF system sends an e-mail notification of the filing to the parties and counsel of record who are registered with the Court's CM/ECF system.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on February 6, 2024, at Costa Mesa, California.

/s/ Abbas Kazerounian
ABBAS KAZEROUNIAN

